

FY 2011 ANNUAL ACTION PLAN

Community Development Block Grant
HOME Investment Partnerships Program



CITY OF NASHUA, NH

Prepared for the
US Department of Housing and Urban Development

By the

City of Nashua

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DRAFT

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GENERAL

Executive Summary

The City of Nashua, NH's Five-Year Consolidated Plan identifies the community's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them. It also serves as the application for funding to the U.S. Department of Housing and Community Development (HUD) for the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) federal entitlement programs that serve low-income individuals and/or families. This Consolidated Plan covers the period beginning July 1, 2010 through June 30, 2015. The plan may be found on the City's website www.gonashua.com. Although the City is not an entitlement grantee under the McKinney Act, Emergency Shelter Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) programs, funds from these programs may be sought on a competitive basis, consistent with this Consolidated Plan.

The Consolidated Plan lead agency in Nashua is the Urban Programs Department (UPD) of the Community Development Division. The Consolidated Plan is the product of public outreach, public hearings and consultation with public, private, non-profit and other organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The Consolidated Plan is intended to reflect community needs and to guide the use of CDBG, HOME and other federal resources to principally benefit low-moderate income individuals/families in Nashua over the next five years.

The goals of the Consolidated Plan parallel those that HUD has established for jurisdictions across the country to pursue as part of their consolidated planning efforts:

CONSOLIDATED PLAN PRIORITY GOALS

GOAL I: DECENT, AFFORDABLE HOUSING: Provide decent, affordable housing for the community's lowest income households, including households with special needs.

GOAL II: EXPANDED ECONOMIC OPPORTUNITY: Create economic opportunities for residents and businesses in low income areas of the community.

GOAL III: SUITABLE LIVING ENVIRONMENT: Improve the living environment/quality of life in low-income neighborhoods.

Priorities, Goals and Objectives

A wide range of needs were identified through this participatory process. However, several consistent themes became apparent related primarily to employment, affordable housing, affordable healthcare/insurance and neighborhoods. Many of the goals are inter-related and can be achieved through a multi-pronged approach. Additionally, it became apparent through analysis of the data required to compile this Consolidated Plan that the City's residents would benefit from a designated Neighborhood Revitalization Strategy Area (NRSA). A jurisdiction that elects to develop a NRSA that includes the economic empowerment of low-moderate income individuals obtains greater flexibility in the use of CDBG funds in the NRSA. The priorities, goals and objectives for this plan are summarized in the table on the following page. Only high and medium priority objectives were included in this table.

GOAL A: STRENGTHENING NEIGHBORHOODS (32%)	
<u>Objectives</u>	PRIORITY
➤ Increase home ownership in areas of low-moderate income (LMI) concentrations to increase income diversity	HIGH
➤ Increase the supply of rental housing to meet needs of all income groups	HIGH
➤ Enhance the character of existing neighborhoods and revitalize older ones	HIGH
➤ Ensure safe, sanitary housing and prevent housing discrimination	MEDIUM
➤ Improve the quality of existing housing stock	MEDIUM
➤ Improve quality of life issues contributing to neighborhood blight	MEDIUM
GOAL B: IMPROVE ECONOMIC OPPORTUNITIES (18%)	
<u>Objectives</u>	
➤ Improve the economic well being of Nashua's LMI individuals through job creation or retention	HIGH
➤ Stimulate the growth of new enterprises, including microenterprises	HIGH
➤ Enhance the vitality of neighborhood business districts and Downtown Nashua	HIGH
➤ Reclaim brownfields and other abandoned and underutilized sites	MEDIUM
➤ Enhance the job skills of Nashua's workforce, particularly LMI individuals	MEDIUM
GOAL C: IMPROVE THE QUALITY OF LOCAL INFRASTRUCTURE (20%)	
<u>Objectives</u>	
➤ Improve the quality/increase the quantity of public improvements that benefit low-moderate income individuals	HIGH
➤ Provide low-moderate income residents with accessible open space, from neighborhood playgrounds to large scale regional parks	HIGH
➤ Ensure neighborhoods have access to schools, community centers, and open space via sidewalks or trails	MEDIUM

GOAL D: IMPROVE THE QUALITY OF COMMUNITY FACILITIES (15%)		
<u>Objectives</u>		
➤Improve the quality/increase the quantity of facilities serving LMI individuals		HIGH
➤Improve the quality/increase the quantity of facilities that benefit LMI teens and youth		HIGH
GOAL E: IMPROVE THE QUALITY OF PUBLIC SERVICES (15%)		
<u>Objectives</u>		
➤Improve services for all LMI individuals		HIGH
➤Improve services for LMI youth and teens		HIGH

General Questions

Geographic Area Description

Date of Incorporation: 1853

Area: 32 square miles

Population, 2009:86,897 (est.)

Nickname: The Gate City

Known as the “Gate City”, Nashua is the second largest municipality in New Hampshire. Nashua is one of several mill cities in the Merrimack River valley, including Manchester, NH, Lowell, MA and Lawrence, MA that evolved into regional centers, containing most of their regions’ population, commerce, and industry. The exchange of commerce was fueled by waterways (rivers and canals) and then by railroads starting in the 1830’s. In the period from the late 1800’s to the early 1900’s, Nashua’s population grew steadily, from 13,397 in 1880 to 31,463 in 1930.

The City has consistently strived for distribution of CDBG funds to especially needy neighborhoods, which are usually defined by HUD as those areas with high concentrations of low and moderate income residents and those areas which have a disproportionate minority population in need. In this respect it has been successful.

Significant concentrations of low and moderate income persons and/or racial concentrations, provide pertinent information when decisions are made of where CDBG resources might be focused. De-concentration of poverty and race is a Congressional objective and under HUD regulations it affects the site selection of new housing. It also defines how some CDBG uses may be approved under what is termed an ‘area benefit’. Under this designation, it is presumed that activities funded with CDBG would primarily benefit low income persons, if they are implemented in a defined area with a low-moderate income population of 51% or greater.

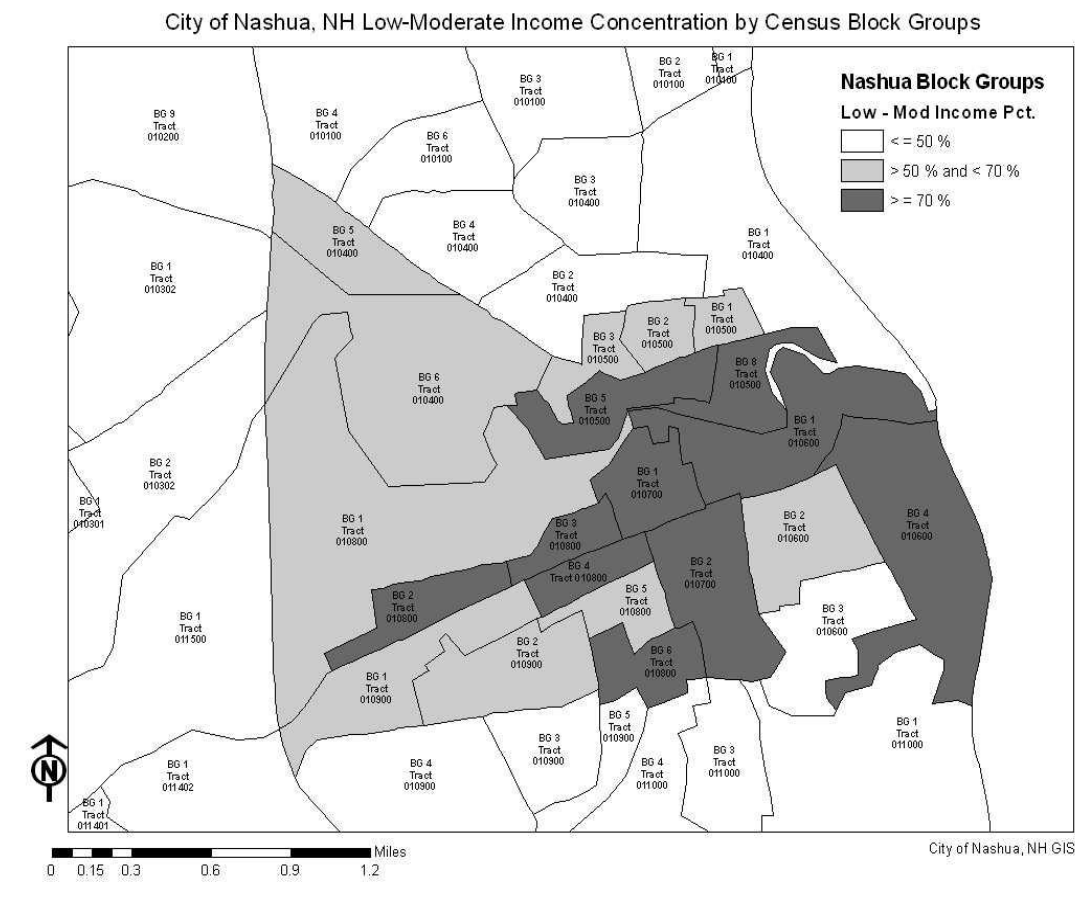
As can be seen from the table below, the concentration of poverty in Nashua has remained constant through 2008. The minority population has grown by over forty percent during the past nine years. Although it is common to base funding decisions on Census 2000 data, in most cases that data does not accurately reflect current conditions. Throughout this Plan we have used acceptable sources, when available, to more accurately portray the City.

Poverty and Racial Concentrations

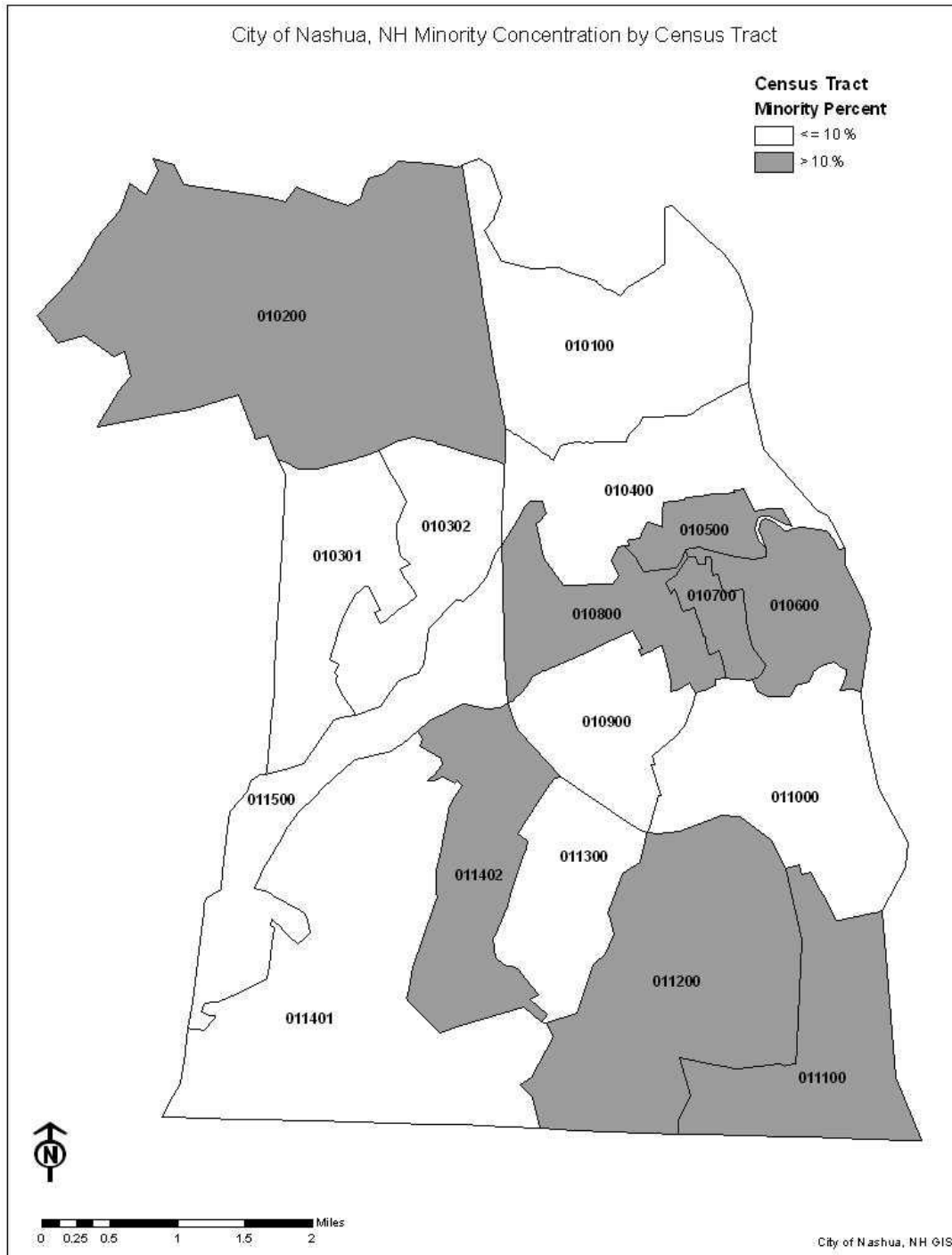
% Poverty Families Census 2000	% Poverty Families ACS 2008 ¹	% Minority 2000 Census	% Minority 2008 ACS Estimate	% Minority 2009 ESRI Estimate
6.76%	6.36%	10.81%	14.20%	14.86%

Source: US Census 2000 SF3, American Community Survey 2008, ESRI forecasts for 2009 and 2014

Based on 2009 HUD and US Census data, there are a total of 20 Census blocks where greater than 50% of the population is low-moderate income. Of those 20, half have very high concentrations of low-moderate income populations (greater than 70%). The map below shows areas of low and moderate income concentrations. The City prefers to view low-moderate income population data by Census block in order to better understand where the true concentrations of low-moderate income populations exist. There are four Census tracts with overall concentrations of low-moderate income individuals, versus 20 Census blocks. Any area where greater than 50% of the population is low-moderate income is eligible for area benefit designation of CDBG funds. There may be instances where the activity is not in a low-moderate income Census tract, but is in a low-moderate income Census block. The distinction between this data is very important.



The following map and table shows the census tracts in terms of racial concentration based on ESRI 2009 data. Eight census tracts in Nashua have a minority concentration of more than 10% and two census tracts are over 30% minority. Note that the top four census tracts in terms of low-mod population (010800, 010700, 010600 and 010500) are also among the census tracts with the highest minority concentrations.



2. Basis for Geographic Allocation

The primary objectives of the Consolidated Plan programs are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside. The proposed NRSA sets a high priority for the City to target activities to benefit this area. The NRSA plan describes the boundaries of the area based on Census blocks; however it generally covers Census Tracts 104-108.

Although the "inner city" has the highest concentrations of low-moderate income individuals, priority objectives may take place in any area that benefits low-moderate income individuals. According to HUD regulations, an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.

The City envisions continuing targeting a substantial portion of its CDBG resources to those neighborhoods found within Nashua's low/moderate income census tracts, thus maximizing the benefits CDBG funds may produce within these neighborhood settings. However, while many of the areas being targeted are also CDBG defined area benefit neighborhoods, the City does not plan to use that technical eligibility criterion.

The public facilities and improvements projects that will receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living throughout the community. Many of the proposed improvements are designed specifically to accommodate and provide accessibility to the physically disabled.

Public housing and housing assistance for low and moderate-income families in Nashua faces ongoing shortages. The Nashua Housing Authority reports that as of April 1, 2010, it had 1,926 families on its Public Housing waiting list, and another 3,182 on the Vouchers waiting list. The 1,926 family waiting list for public housing translates into a four to five-year wait. For senior citizens the wait could be much longer, as long as five to seven years.

There are many other subsidized housing units throughout the City with waiting list. The table below details the waiting list times most of the City's subsidized housing:

Waiting Lists for Subsidized Housing in 2010

Project Name	Type	Number on List	Length of Wait
Amherst Park 1 BR	Family	37	2 years
Amherst Park 2 BR	Family	91	2 years
Amherst Park 3 BR	Family	12	3 to 5 years
Clocktower 1 BR	Elderly/Family	51	8 months
Clocktower 2 BR	Elderly/Family	172	8 months
Clocktower 3 BR	Elderly/Family	17	7 months
Coliseum Sr. Res.	Elderly	74	3 to 4 years
Davidson Landing I-II Wagner Ct/StreeterShores	Elderly	83	2 years
Gatewood Manor	Elderly	49	9 - 12 Months
Harbor Homes-Scattered	Special Needs	206	1 ½ to 2 years
Harbor Homes-Winter	Special Needs	9	6 months – 1 year
Harbor Homes-Alls	Special Needs	91	1 to 1 ½ year
Harbor Homes-Chestnut	Special Needs	9	6 months – 1 year

Project Name	Type	Number on List	Length of Wait
Harbor Homes-Safe Haven	Special Needs	76	1 year
Harbor Homes-Maple St.	Special needs	142	1 to 1 ½ years
Harbor Homes-Vouchers	Special Needs	68	2 ½ to 3 years
Harbor Homes-PH	Special Needs	190	1 ½ to 2 years
Harbor Homes-Veterans	Transitional	15	2 to 6 months
NHA- 1 BR	Elderly	51	1 year
NHA- 2 BR	Elderly	5	13 months
NHA-1 BR	Family	487	3 years
NHA-2 BR	Family	707	3 years
NHA-3 BR	Family	289	2 years
NHA-4 BR	Family	53	2 years
NHA- Section 8		3,073	5 years
Pheasant Run Apts.	Family	14	3 mos.
Pratt Homes 1 BR	Elderly/Special	34	4 - 6 years
Pratt Homes 2 BR	Elderly/Special	7	1 - 2 years
Village Gate	Elderly	9	1 year
Xavier House	Elderly	9	1 year

3. Addressing Obstacles to meeting underserved needs

The greatest obstacle to meeting underserved needs is the continued lack of funding. Federal and local budget cuts, economic downturn, subprime mortgage crisis and foreclosure spike, housing market and the political climate impacting public policy have resulted in the increased community priority needs for services, economic opportunities and affordable housing. These have also resulted in reduced funding, causing fewer services, program elimination, staffing cuts and the loss of other essential resources. This trend has been changing with the increase of private financing for affordable housing and other social service projects.

The City of Nashua actively addresses this obstacle by operating as collaboratively and efficiently as possible. Like all communities, we are finding ways to meet underserved needs by doing more with less. For example, proactively identifying the highest priority needs via front-line involvement and leadership presence with the City Departments, human service agencies and other community organizations that are most qualified and equipped to identify the neediest citizens. Essentially, being at the policy and decision making table, rather than awaiting news and direction from "the table".

Another strategy is identifying and eliminating duplication of services. Use of best practice guidelines, systems, and documents as available at HUD's website or elsewhere on line, translates into availability of funds for allocation to community development programs.

4. Resources expected to assist with addressing identified needs

Federal resources will include the Community Development Block Grant for the City's Program year starting July 1, 2010 in the amount of \$799,401 and HOME Housing Partnerships Program Partnership Program funds in the amount of \$560,111. In addition, the city of Nashua anticipates re-programming \$70,352 in CDBG funds in the upcoming fiscal year.

Program income in the amount of \$35,000 is expected from repayments of loans made through the Housing Improvement Program as well as contractual supervision fees for a defunct HODAG project known as Clocktower Place.

Additionally, in FY08 (HUD Program Year 2007) the city of Nashua was awarded a \$3M Lead Hazard Control Grant and most recently was awarded a \$2M Brownfields Economic Development Grant. The City of Nashua is a Tier 1 community within the State of New Hampshire for the Neighborhood Stabilization Program and has recently received \$1.9M to purchase, rehabilitate and /or demolish foreclosed or abandoned properties in the 107 and 108 census tracts.

Other resources from private and non-Federal public sources are expected to be made available to leverage these Federal funds, particularly HOME funds, such as the Federal Home Loan Bank's Affordable Housing Program, proceeds from the Low Income Housing Tax Credit syndication, historical tax credits, new markets tax credits and conventional mortgage products.

HOME Match: Developers of projects funded under the City's HOME program are required to contribute a minimum 25% non-federal match. This match can be cash (but not owner equity), services, labor and donated materials/equipment, waived taxes or fees, value of donated land, cost of infrastructure improvements, or other resources that become a permanent contribution to affordable housing. Direct costs of supportive services to residents of HOME projects can also be considered as match.

Managing the Process

1. Lead Agency

The City of Nashua's Urban Programs Department (UPD) within the Community Development Division is the lead agency responsible for the development of this Consolidated Plan. The UPD manages the HOME, CDBG and housing rehabilitation programs for the City, including management of sub-recipients carrying out activities funded by these programs. The lead legislative body is the Human Affairs Committee of the Nashua Board of Aldermen. The Committee holds the public hearings for the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER) and any other hearings required for federal programs. The Committee deliberates the annual applications for funding under the CDBG program and makes the recommendations to the Board of Aldermen. Many other agencies are involved in the administration of programs covered under the Plan. They may include:

City of Nashua: Public Works Division, Police Department, Nashua Fire Rescue, Office of Economic Development, Division of Public Health and Community Services and Welfare Department

Other Public Agencies/Organizations: Greater Nashua Continuum of Care and Nashua Housing Authority

Private Agencies/Organizations: Big Brother/Big Sister, Boys and Girls Club, Bridges, Dental Connections, Greater Nashua Council on Alcoholism, Girls Incorporated, Greater Nashua Habitat for Humanity, Harbor Homes, Marguerite's Place, Nashua Children's Home, Nashua Pastoral Care Center, Nashua Soup Kitchen, Neighborhood Housing Services of Greater Nashua, New Hampshire Legal Assistance, PLUS Company, Salvation Army, Southern New Hampshire Services, Tolles Street Mission, The Upper Room and others.

2. Plan Development Process

This Plan was developed through the collaborative effort of City departments, nonprofit agencies, religious institutions, the Greater Nashua Continuum of Care, the Nashua Housing Authority, citizens, local businesses and other interested parties. Special attention was paid to ensure low-moderate income individuals, minority groups, those directly impacted by the Plan and the agencies who service these individuals were included. In addition to direct consultations, described in further detail under Consultations below, the UPD took advantage of the many surveys, studies and public opinion forums already conducted. The use of these sources are discussed in detail in the 2010-201 Consolidated Plan. Following is a list of sources used:

- **2000 Master Plan**

The City of Nashua has based the development of its five-year Consolidated Plan on the City's Master Plan. The Master Plan, which was adopted in 2000, serves as the planning guide for the City as it prepares for Nashua's future. The overall goal of the Master Plan states that "Every effort will be made to make Nashua a desirable place to live". The overall vision of the Master Plan is stated in the Mission statement above. Although the Master Plan was adopted in 2000, the goals are still relevant and related to the goals within this Consolidated Plan: Housing, Conservation and Preservation, Economic Development, Transportation, Community Facilities/Utilities/Public Services, and Growth and Development

- **2009 United Way Community Assessment**

The United Way conducted an assessment to document and evaluate the health and well being of residents living in the Greater Nashua area. The techniques used to gather information included a household survey posed to 500 area residents, a Human Services Agency survey completed by 61 agencies, and five focus groups. The detailed results of the surveys and focus groups were used, in part, to prioritize the needs identified in the Consolidated Plan.

The overriding concern in the community is affordable medical/health care. Unemployment and job security were major issues, including finding a job with medical benefits.

- **2010 Neighborhood Survey**

The 2010 Neighborhood Survey was designed by the UPD to examine issues faced by residents in the Tree Street Neighborhood of Nashua—an area historically populated by a large percentage of low and moderate income

individuals as evidenced by Census data. The survey objective was to ascertain resident views on several important issues, including housing, economic development, health care, crime, youth education, and their neighborhood. A similar survey was conducted in 2007. This area was selected as a focus group so that UPD could compare and contrast the change over the last three years. The top three issues identified were: Finding a good job, finding a job with benefits and unemployment/full-time work.

- **Downtown Nashua Market Analysis: Consumer and Business Survey**

The Downtown Nashua Consumer Survey and Business Survey were designed to examine information on issues facing downtown businesses, the evolving nature of regional competition, and consumer/resident needs and preferences. This information will be used by the City of Nashua to develop programs and initiatives to overcome barriers to business success. The goal is to create an environment where residents, particularly low and moderate income individuals, can participate in and benefit from a strong and vibrant local economy. Job opportunities are created by strengthening neighborhood businesses. Many Downtown Nashua retail businesses and restaurants provide jobs for low and moderate income individuals.

The UPD consulted directly with the Greater Nashua Continuum of Care, nonprofit and social service agencies, the Nashua Housing Authority, The New Hampshire Housing Finance Authority, public agencies and City departments regarding the priorities and needs addressed in this Plan. These consultations transpired through questionnaires, interviews and discussions groups. Results of these consultations are more fully described in the section above. Details of the inter-departmental and Continuum of Care sessions held are below.

Drafts of the Plan were sent to the NH Community Development Finance Authority, the NH Housing Finance Authority and the Nashua Regional Planning Commission.

INTER-DEPARTMENTAL COLLABORATIVE SESSION

On February 3, 2010 the UPD held an Inter-Departmental Collaborative Session. The purpose of the Session was to provide the opportunity for key departments to contribute critical information from their perspectives, based on the area of service they provide. Managers from the following departments participated: Police Department; School Department; Code Enforcement; Division of Public Health and Community Services; Welfare Department; Division of Public Works; Economic Development; Financial Services Division; Urban Programs Department; Transportation Department; and Community Development Division. The purpose of the Consolidated Plan was explained and the importance to integrate Department plans into the Five-year Consolidated Plan. Limited funding available under CDBG, HOME and related programs required the Department directors to prioritize their needs.

The discussion at the Inter-Departmental Session included five general categories: crime and youth education, economic development, healthcare, housing, and neighborhoods. The current economic situation in the United States today affects every Nashua resident. The consensus of the City representatives was that community's most pressing needs were economic development related. The group stressed the need for good jobs (decent pay, benefits), youth programs and neighborhood character building.

CONTINUUM OF CARE CONSULTATION SESSION

On March 30, 2010 the UPD held a consultation session with the Greater Nashua Continuum of Care (GNCOC). The purpose of the session was to provide the opportunity for GNCOC members to help the City identify community needs, especially as they relate to homelessness. A total of 13 members attended from the following agencies: Neighborhood Housing Services of Greater Nashua, Southern NH HIV/AIDS Taskforce, Marguerite's Place, MP Housing, Nashua Children's Home, Greater Nashua Mental Health Center, Nashua Soup Kitchen and Shelter, Nashua Housing Authority, NH Charitable Foundation, Harbor Homes and Nashua Pastoral Care Center. A summary of the topics which were discussed at length follows.

The discussion included five general categories: crime and youth education, economic development, healthcare, housing, and neighborhoods. Participants were asked to identify which activities in the categories above are done well in the City and which need to be improved. The topic of neighborhoods generated much discussion. Some of the needs identified included parking issues, density issues, trash/litter, the lack of community events, green space bike paths and many more. They noted the "Safe Routes to School" and redevelopment of certain properties as strengths to build upon.

Participants also identified health care and medical issues as a strong priority. There are many uninsured or under insured individuals facing medical challenges. The cost of prescription drugs and co-payments has risen significantly in recent years. The group felt there is a significant unmet need for mentally ill and drug/alcohol treatment and lack of dental care. The group noted several strengths, such as two full-service hospitals that offer financial assistance and collaborate with area non-profits, the work of the non-profits and the American Recovery and Reinvestment Act (ARRA) supplementing COBRA insurance. However, the need to extend the ARRA supplementation was noted.

Of the other topics, youth, crime, economic development and housing each category had many strengths and weaknesses identified. Youth issues included drug use, lack of supervision, jobs, and food/hunger and truancy. Strengths included: good schools/programs, student run food pantry at high school, Nashua Public Library, Family Resource Center and Nashua Parks & Recreation's programs. Crime strengths: low state-wide crime rates, strong court diversion program, active crime watch groups. Crime issues: gangs, bullying, unemployment, domestic violence, internet crimes. The relationship of economic development to many of the community-wide issues was noted. The group felt that by creating a strong economic environment, that includes good paying jobs with benefits, affordable daycare, skills training and strong public transit system, residents would be able to better lift themselves out of poverty. Housing needs identified included holding landlords accountable (absentee landlords), need for more Section 8 vouchers and other subsidies, incentives for good landlords, emergency rental funds and homebuyer assistance. Strengths included housing for persons with HIV/AIDS, veterans, single mothers with children and elderly. The GNCOC advocates maximizing the proportion of CDBG dollars spent on housing production, especially for the population at risk of becoming homeless.

Citizen Participation

1. Citizen Participation Plan

Many of the items discussed in the Plan Development and Consultations sections above detail the citizen participation process followed to prepare this Plan. The City utilized technology to access citizens. It was our intent to reduce the burden of attending on-site collaborative sessions. Historically, these sessions lasted many hours requiring participants to either take time out of work or take time out of their evenings, which often created child care issues. It was our hope to access those citizens who do not normally attend collaborative sessions or public hearings.

The website SurveyMonkey© was used to consult with the service agencies of the community and for the resident survey. In addition to the online resident survey, AmeriCorps VISTA volunteers conducted a door-door survey in English and Spanish. In total approximately 250 resident responses were received and 30 agency responses. The surveys were available for four-six weeks and was posted on the City's website, the local access channel, e-mailed directly and mentioned at public Human Affairs Committee meetings.

A public hearing was conducted by the Human Affairs Committee on January 25, 2010 for the purpose of receiving public comment on past performance and future needs related to CDBG. The notice of the public hearing was published in the Nashua Telegraph on January 1, 2010.

The UPD offered a technical assistance workshop for agencies interested in submitting applications for FY2010 CDBG funding on January 21, 2010. At the workshop we reviewed the application, the funding process and requirements that would follow if they were to be funded. The UPD provided guidance and answered specific questions asked by the five agencies who attended.

On March 31, 2010 the UPD held a session with the Greater Nashua Continuum of Care (GNCOC) at Nashua City Hall to seek their input on setting the priorities and identifying the critical issues facing Nashua's low and moderate income residents. Notice of the meeting was sent to all members of the GNCOC via e-mail and was posted as a public meeting on the City's website.

The Citizen Participation Plan, provided as an attachment to this document, was revised and updated to reflect HUD requirements. It was released with this Consolidated Plan and available for public comment for 30-days starting April 26, 2010 at Nashua City Hall, City Clerk's Office and Division of Community Development and the Nashua Public Library. All activities were consistent with the existing and revised Citizen Participation Plan.

A public hearing was held on **May 3, 2010** by the Human Affairs Committee for the purpose of receiving public comment on the Drafts of the 2010 Consolidated Plan, Citizen Participation Plan, Annual Action Plan and Neighborhood Revitalization Strategy Area Plan.

2. Citizen Comments

Citizen comments will be added following the public comment period.

3. Efforts to Broaden Citizen Participation

The citizen participation activities discussed above were conducted in an effort to outreach to minorities and non-English speaking persons, as well as persons with disabilities. The resident survey was conducted orally and availability written in Spanish and English in an area where there is a high Hispanic population. Persons with limited mobility could access the survey online. Ongoing efforts are detailed in our Citizen Participation Plan.

4. Comments Not Accepted

The City anticipates accepting all formal comments.

Institutional Structure

1. Actions to Develop Institutional Structure

The central responsibility for the administration of the Annual Action Plan is assigned to the Urban Programs Department (UPD). This agency will coordinate activities among the public and private organizations' efforts to realize the prioritized goals of the Annual Action Plan. Extensive public-private partnerships have been established and organized to address the City's housing and community development needs. The UPD will access, facilitate, and coordinate resource linkages and draw from the immediate sources of expertise in the community to strengthen existing partnerships and develop new collaborative relationships.

2. Other Actions

Actions to Affirmatively Further Fair Housing

These actions are focused principally on the three impediments to fair housing choice found in the 1996 statewide assessment, performed by Applied Economic Research.

Bias against families with children

- Continue program of lead paint hazard reduction in order to reduce owner resistance to renting to families with small children.
- The city of Nashua was successful in our application for a 3 -year Lead Hazard Control grant in the amount of \$3 Million. This money is being used to assist low and moderate income families, including renters as well as owners, in abating and remediating lead hazards.
- Maintain staff capacity to administer programs and train in lead hazard reduction.
- Continue education of landlords and tenants via the housing code enforcement function and distribution of information materials.
- Track data on construction trends by unit size.
- Participate on New Hampshire Housing Commission on solutions to affordable housing.
- Include fair housing choice as a consideration in the development of new land use regulations.

Bias against persons with disabilities

- Continue to work with agencies serving those with disabilities to expand housing opportunities.
- Consider special housing needs in implementation of the Affordable Housing Trust Fund.

Bias against persons of differing race, color, and national origin

- As it becomes available, use US Census data to study trends in minority concentration and homeownership.
- Participation in the Mayor's Ethnic Awareness Committee, The U.S. Department of Justice Community Relations Service Initiative to address discrimination, NeighborWorks Inc. Community Leadership Institute and The Governor's Council on Latino Affairs representing the Nashua area. Southern New Hampshire Hispanic Network, The Greater Nashua Latino Community Council and other identified groups.
- Update information on complaints of discrimination filed from Nashua.
- Review recent Home Mortgage Disclosure Act data on lending practices.
- Distribute educational material to the general public.
- Refer families at risk for foreclosure to local housing counseling agency as well as the NeighborWorks help line.

Monitoring

Overview

The City of Nashua recognizes monitoring of CDBG, HOME, and CDBG-R as an important component in the administration of HUD funds. An internal management plan is in place to ensure the proper and timely implementation of both the strategic and annual plans, and also the carrying out of compliance with HUD program requirements.

Time Line

- Desk Audits are performed on a monthly basis. The benefit is two-fold. To review and confirm compliance to HUD regulations, and to identify high risk sub-recipients. High risk factors might include:
 - Sub-recipients who are new to the HUD programs implemented
 - Sub-recipients who have experienced high turnover in key staff positions
 - Sub-recipients struggling to meet schedules, submit performance reports, submit timely invoices
- On-Site Visits are scheduled annually

Process

On-site monitoring will continue to be conducted in the following manner:

- Personal contact with responsible party, as defined in application, to explain monitoring purpose and schedule date and time for on-site visit.
- Follow up letter confirming call, date and time of visit. This letter should also confirm aspects of the visit to explain what can be expected, what materials need to be provided, who should be present at meeting, and length of time needed to complete monitoring.
- Prior to site visit, monitor shall review all written data on file, including application agreement, previously submitted performance data, documentation of previous monitoring, and copies of audits

Monitoring Check List needs to be available during site-visit, to be completed by Monitor. Site visit includes:

- Entrance conference to clarify purpose, scope and schedule
- Thorough review of sub-recipient's files to ensure compliance with all administrative, financial and programmatic regulations.
- Exit interview to present preliminary findings to key representatives, clarify position, and clear up misunderstandings
- Follow up letter is sent to facility describing visit, and results
- Depending upon condition of records, several results are possible

Site Visit Results

Follow up letter will be sent within 10 days of on-site visit, thanking the facility for their time and cooperation and offering recommendations to address and rectify any problems that were encountered. The following may be instituted, ranging from mild to severe actions:

- Provide recommendation; no follow up action necessary
- Identify deadline when specific issues must be corrected. Re-visit to site, or have organization send documentation showing correction
- Organization placed on probationary period, until sub-recipient is in compliance
- Restrict payment requests until sub-recipient is in compliance
- Do not renew organization award in next program year
- Terminate organization for the current year

Lead-Based Paint

1. Actions to Address Housing Units with Lead-Based Paint

The City of Nashua is designated, by the NH Childhood Lead Poisoning Prevention Program, as a high-risk community. In New Hampshire (NH), communities with 27% or more of the housing stock built before 1950 are considered high-risk. Our high-risk status, combined with other income and socio-economic factors, demonstrates the need for significant efforts to address lead hazards in housing occupied by low-income households.

The table below shows the characteristics of the City's housing stock. All housing units built before 1980 are counted herein as being likely to have lead based paint hazards. 1978 was the first year that Federal law prohibited the use of lead-based paint in residential property and housing data is only available in ten year increments.

Breakdown of Nashua's Housing Stock						
Housing Age	Renter		Owner		Total Units	% w/ Young Children
2000+	395	1.1%	1,070	3.1%	1465	30.7%
1980 to 1999	3,090	9.0%	6,890	20.0%	9980	12.1%

1960 to 1979	3,680	10.7%	8,005	23.2%	11685	13.3%
1940 to 1959	1,965	5.7%	2,840	8.2%	4805	18.7%
1939 or older	4,175	12.1%	2,415	7.0%	6590	15.2%
Total Units	13,305		21,220		34,525	
Total Pre-1980 Units	9,820		13,260		67%	47.2%

Source: 2009 CHAS Data

The City of Nashua successfully applied to HUD's Office of Healthy Homes and Lead Hazard Control for a three-year, \$3 million Lead-Based Paint Hazard Control Grant (LBPHCG). The effective dates of the grant are November 1, 2007 to October 31, 2010. During this time at least 150 existing residential units throughout the City will be made lead safe, with a focus on Census tracts 105-108. Grant funds of approximately \$10,000 per unit will be available to qualified low-income homeowners and landlords who rent to low-income tenants. Rental units assisted with LBPHCG funds are restricted to occupancy by low-income households for a three-year period following lead hazard reduction activities. Landlords must also give priority in renting to households with a child less than six years of age.

As of this writing, the grant program addressed lead hazards in 173 units, 170 of which were in Census tracts 104-108. Another 26 units, also within Census tracts 104-108, are in the pipeline and expected to be complete by October 31, 2010. The City intends to re-apply to HUD's Office of Healthy Housing and Lead Safe Housing during FY2011 to continue these important efforts.

The City of Nashua's Division of Public Health and Community Services provides free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. Nurses offer one-on-one education with parents of children with elevated blood lead levels. The City is working toward reaching a "One Touch" approach in dealing with the multiple health hazards in homes. A one touch approach takes advantage of the fact that many different agencies may be visiting a home. Whichever is the first to get their foot in the door should identify the potential hazards, correct the problems, refer occupants to services or educate, thus reducing the number of visits/agencies to one home. Keeping this goal in mind, the City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Lead Grant Program.

HOUSING

Specific Housing Objectives

1. Specific Housing Objectives

The table below summarizes the specific housing objectives the City hopes to achieve over the five year period from July 1, 2010 to June 30, 2012.

Activity	Units	Goal
Rental Housing	Housing Units	4
Construction of Housing	Housing Units	2
Rehab LMI Owner-Occupied	Housing Units	5
Homeownership Assistance, Counseling Ed.	Households	5
Ensure Safe & Sanitary Housing	Housing Units	75

2. Use of Resources for Housing Objectives

The characteristics of the housing market will significantly impact how the City will direct its housing funds over the next five years. Specifically, the City intends to focus its resources on homeownership. Homeownership provides households with an opportunity to build equity and benefits the community by encouraging neighborhood stabilization. Further the City will place emphasis on ownership in high rental, low income areas to encourage income diversity.

Needs of Public Housing

1. City Support of Public Housing Activities

The city has limited resources to assist the needs of the NHA and its clients, especially when compared with the needs of those who do not have access to affordable housing. However, as the quality of the living environment for residents is critical to the neighborhoods within which public housing is placed, the Agency will do everything it can to support revitalization efforts.

The City directly or indirectly supports a number of special services to public housing residents, as follows:

1. Police Athletic League programs
2. Girls Inc. Programs
3. Boys & Girls Club programs
4. Nashua Youth Council programs
5. Public transportation service
6. Head Start programs at Housing Authority sites

2. Troubled Designation

Nashua Housing Authority is not designated as a troubled agency and there are no indications that it has been performing poorly, in fact it is designated as a high performer by HUD.

Barriers to Affordable Housing

1. Actions to Remove Barriers to Affordable Housing

Property costs in Nashua, although increasing rapidly with the overall market, remain lower than those of all of its neighboring towns and most communities in the region. Property taxes are comparatively low and the City has historically encouraged diverse uses of land.

Nevertheless, the cost of affordable housing production remains high in the Nashua market. As a result, the City continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. In 2006 the City adopted a new land use code that includes inclusionary zoning, which provides density incentives for projects where the applicant consents to designate some number of units as affordable.

HOME/ American Dream Down payment Initiative (ADDI)

At this time the City does not use its HOME funds to assist homebuyers, refinance existing debt or receive ADDI funds.

HOMELESS

Specific Homeless Prevention Elements

The Greater Nashua (GNCOC) is the primary decision making group that manages the overall planning effort for the entire COC. The communities served by the COC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOC utilizes federal, state and private funds to address the needs of homeless, including competitive HOPWA grants.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. However, often, in addition to affordable housing, homeless families and individuals also need supportive services to make the transition to independent living or to deal with other problems, including substance abuse or mental illness. Finally, in order to maintain themselves, these individuals and families may require assistance with childcare, transportation, life skills, job training and other basic life skills.

The City will support the above activities through funding of non-profit agencies who address homeless needs. The funds will be directed to homelessness in general, the chronically homeless and prevention. The City further supports the GNCOC's 10-Year Plan to End Homelessness.

Potential obstacles to addressing homelessness include lack of funding, competing priority needs and reductions of state funding.

The GNCOC has a formal discharge plan in place and continues to work with the affected agencies to ensure the plan is implemented.

COMMUNITY DEVELOPMENT

Community Development

1. Priority Non-Housing Community Development Needs

Priority Need	Priority Need Level
Clearance and Demolition	Medium
Clearance of Contaminated Sites	Medium
Public Facilities (General)	
Senior Centers	Low
Handicapped Centers	Medium
Homeless Facilities	Medium
Youth Centers	High
Neighborhood Facilities	Medium
Health Facilities	High
Parks and/or Recreation Facilities	High
Non-Residential Historic Preservation	Low

Priority Need	Priority Need Level
Infrastructure (General)	
Street Improvements	Medium
Sidewalks	Medium
Public Services (General)	
Youth Services	High
Substance Abuse Services	Medium
Health Services	High
Tenant Landlord Counseling	High
Economic Development (General)	
C/I Land Acquisition/Disposition	Medium
C/I Infrastructure Development	Medium
C/I Building Acquisition/Const/Rehab	Medium
ED Assistance to For-Profit	High
ED Technical Assistance	High
Micro-enterprise Assistance	High

2. Specific Objectives

All proposed and projected accomplishments throughout this plan are five-year goals based on the presumption of a certain level of annual funding and are subject to the availability of funds. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year. Accomplishments may change if funding is reduced or increased during the five year planning period. The objectives noted below are non-housing community development needs.

Economic Development

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
EO-1.1	Improve the economic well being of Nashua's LMI individuals through job creation & retention	# of jobs created or retained	60
EO-1.2	Stimulate the growth of new enterprises, including micro-enterprises	# of businesses assisted	50
EO-1.3	Reclaim brownfields and other abandoned or underutilized sites	# of sites remediated or redeveloped	10
Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
EO-1.4	Enhance job skills of LMI individuals	# of individuals trained	150
EO-3.1	Enhance the vitality of neighborhood business districts and Downtown Nashua	# of improvement projects	5

Local Infrastructure & Strengthening Neighborhoods

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
SL-3.1	Enhance the character of existing neighborhoods and revitalize older ones	# of neighborhood projects	3
SL-3.2	Improve quality of life issues contributing to neighborhood blight	# of properties addressed on a spot basis	3
SL-3.3	Improve the quality/increase of public improvements that benefit LMI individuals	# of infrastructure projects completed	5
SL-3.4	Provide LMI residents with accessible open space, from neighborhood playgrounds to large scale regional parks	# of parks/green space projects completed	10
SL-3.5	Ensure neighborhoods have access to schools, community centers and open space via sidewalks or trails	# of sidewalk, parking, trail, etc projects completed	5

Community Facilities and Public Services

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
SL-1.1	Improve the quality/increase the quantity of facilities that serve LMI individuals	# of public facilities built or rehabilitated	25
SL-1.2	Improve the quality/increase the quantity of facilities that benefit LMI teens/youth	# of public facilities dedicated to youth built or rehabilitated	20
SL-1.3	Improve services for all LMI individuals	# of individuals served	25,000
SL-1.4	Improve services for LMI youth & teens	# of youth participating in programs	10,000

Antipoverty Strategy

Most activities undertaken by the City with CDBG and other federal and state funds for low income families are efforts to reduce persons in poverty and improve the quality of life for Nashua residents, either directly or indirectly. Staff also works in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

CDBG programs which directly influence the household income level include: job training, job counseling and placement, education and business development. In the

near future and possibly for the next five years, the focus will be on job development and economic stabilization.

CDBG programs that may indirectly influence the impact of household living by those at or below the poverty level, by reducing other costs include, affordable housing, energy efficiency, public transportation and health care assistance.

In the near future and possibly for the next five years the City will be funding the following indirect activities:

In FY 2011, the following indirect activities are being funded:

- Revitalization and economic development activities
- Housing rehabilitation including energy efficiency improvements
- Health services – both physical and mental

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs

1. Priorities and Objectives of Non-Homeless Special Needs

Throughout the City, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, victims of domestic violence, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The city is aware of the needs of special populations and is committed to supporting initiatives which target these populations.

In FY2011, the following agencies are being funded that assist special needs populations:

Public Health & Community Services
Bridges
Dental Connection
Tolles Street Mission

Housing Opportunities for People with AIDS

In FY2011, the City of Nashua is not a direct recipient of funds that addresses the HIV/AIDS population.